



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 8
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DENVER, CO 80202-2466
Phone 800-227-8917
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September 3, 2003

Ref: 8EPR-SR

Mr. Mike Weigel
Putman & Associates
321 SW Higgins
Missoula, MT 59803

RE: FOIA Request # 8RIN 370-03 dated July 28, 2003

Dear Mr. Weigel:

Pursuant to your FOIA request, I have enclosed information regarding each property you referenced in the attached table. Because the overall investigation and cleanup program is somewhat complicated, the information requires some interpretation. The information we are providing clearly answers the first and third questions you put forward, but we are unable to clearly answer the second question. Our cleanup program is based on many factors, but in general, for each particular home, we are unable to say for sure if, and how much, actual exposure to Libby asbestos is occurring or has occurred in the past. The presence of asbestos containing materials is easy to assess - actual exposure is much harder and is dependent on numerous factors. Those reading the results presented in the table should interpret the information carefully.

Property Activities

- CSS stands for contaminant screening study. This was the first phase of investigation for residential/commercial properties and was intended to screen for potential sources of Libby asbestos, such as vermiculite insulation. This program is mostly complete but some properties have not yet been completed for various reasons.
- RI stands for remedial investigation. This was the second phase of investigation for residential/commercial properties and involved follow up visits to obtain additional information for certain properties.
- Pre-Design is an additional inspection for properties that have been earmarked, for whatever reason, for cleanup. Intent is to collect additional information at each property to aid in developing a detailed cleanup plan.
- Cleanup speaks for itself.

Secondary Source Indication

- Generally, we interview residents to determine if a "secondary" source may have



contributed to any potential contamination. These "sources" include things such as working at the former vermiculite mine or processing centers. Generally, if an indication of a secondary source is present, we will conduct some additional RI investigation work such as indoor dust sampling.

Observed Vermiculite

- In many circumstances, the presence of visible vermiculite at a property will spur cleanup action by EPA. While visible vermiculite (insulation, vermiculite in soils, etc.) is a good indicator for the presence of Libby asbestos, its presence does not always imply the presence of "unsafe" levels of asbestos, nor imply a specific level of asbestos. Our approach to using visible vermiculite as a trigger for cleanup was made considering various factors including cost effectiveness of sampling vs. visual inspection, potential for future exposure, and community perception. Again, presence of visible vermiculite may spur cleanup, but does not necessarily imply current or past exposure.
- Visible vermiculite may be handled in different ways depending on its location. In some cases, it will be removed. In others, it will be contained. In others, it will spur additional sampling. Each decision is based on several standard procedures as well as the specifics of the property.

Samples Collected and Results

- In cases where samples are required to determine if cleanup is necessary, they may be collected in various media. Each property is different and additional samples are collected as the investigation/cleanup program proceeds at each property.
- Results generally show the highest reading (e.g. if five soil samples were collected, and four were non-detect, but one had trace, the column will show trace).
- EPA is currently in the process of developing a document which sets forth action levels for emergency response cleanup. We have not yet established site-specific values of what levels of asbestos are "safe" or "unsafe" for the long-term. This will not be completed for several years. In general, for the emergency response cleanup, asbestos levels in soil greater than 1% and dust levels greater than 5000 fibers per square centimeter spur cleanup. Bulk samples (vermiculite insulation) and air samples are generally not used to determine if cleanup is necessary, but may be used otherwise.

If you have any additional questions regarding this information, please call me at (303) 312-6748.

Sincerely,



Jim Christiansen
Remedial Project Manager

Attachment

**FOIA Request
Property Summary**

Property Address	Property Activities				Secondary Source Indication	Observed Vectors										Samples Collected				Results				Additional Comments
	CS#	RI	Pre-Design	Clean Up		Attic	Walls	Indoor Reservoir	Building Materials	Garden	Outdoor		Driveway	Soil	Dust	Bulk	Air	Soil % LA	Dust Stump	Bulk % LA	Air Sec			
											Flowerbed	Yard												
1004 Mineral Ave	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	Y	Y	Archived	ND	N/A	N/A				
1008 W. 9th St	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	Y	N	Archived	ND	N/A	N/A				
1103 Idaho Ave	Y	NR	Y	N	Y	Y	N	N	N	Y	Y	Y	N	Y	Y	N	Archived	ND	N/A	N/A				
111 W. Salmon St	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
115 E. Salmon St	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
1210 California Ave	Y	Y	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
1243 Nevada Ave	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
125 Sunny Side Dr	Y	Y	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
1307 Nevada Ave	Y	Y	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
1307 Westland Rd	Y	Y	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
1404 Utah Ave	Y	Y	NR	NR	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
1406 Utah Ave	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
1408 Division Ave	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
146 Three Corner #30	Y	Y	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
1460 E. 6th St East	Y	Y	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
1462 E. 6th St East	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
149 Ashford Rd	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
1516 Utah Ave	Y	NR	NR	NR	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
1520 Minnesota Ave	Y	Y	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
1601 Rainbow Rd	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
1627 Fraser Rd	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
156 Highland Oaks	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
156 Highway Dr	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
1606 Westside Ave	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
1653 Franny Rd	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
1656 Tatum Rd	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
1752 Hwy 2	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
1775 Tanager Ln	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
178 Woodland Rd	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
185 Woodland Rd	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
187 Glendora Ave	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
189 Timber Lane	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
20 Yamack Ln	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
203 E. 3rd St	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
214 Western Ln	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
221 W. Larch St	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
2266 Farm to Market Rd #2	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
237 W. Poplar St	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
250 W. Cedar St	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
258 Vandenberg Rd	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
276 Vandenberg Rd	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
286 Highway Dr	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
2865 Hwy 27 N	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
30145 Three Corner #30	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
301 W. 2nd St	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
309 E. Salmon St	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
311 Quartz Ave	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
311 Westside Ave	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
313 Colorado Ave	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
318 Westside Ave	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
337 Rock Creek Rd	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
340 Cedar St	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
3636 2nd St East W	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
3724 Hwy 2	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
38 Spencer Hill Way	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
3851 Hwy 2 S	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
4 Orchard Vale Park Blvd	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
40 Wood St	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
401 Dome Mountain Ave	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
42 W. 9th St	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
463 Ave B	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
463 Dome Mountain Ave	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
465 N. 9th St	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
409 Montana Ave	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
409 Norman Ave	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
415 Hennepin Ave	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
417 Cedar St	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
418 Cedar St	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
418 Nevada Ave	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
418 Hwy 2 W	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
450 Farm to Market Rd	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
470 Prospect Creek Road	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
48 Corridor Rd	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
5037 Hwy 2 S #102	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
516 Montana Ave	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
520 Cedar Creek Rd	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
522 Montana Ave	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
52 Wilson Ave	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
57 Frigley Rd	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
579 Reese Court #43	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
58 Highway Dr	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
591 Quartz Road	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
596 Bowlers St	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
595 ACM Road S	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
701 Union Ave	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
703 Highway Ave	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
709 Farm to Market Rd	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
714 Washington Ave	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
726 Farm to Market Rd	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
76 Corridor Rd	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
784 Jay E R Rd	Y	NR	N	N	Y	Y	N	N	N	Y	Y	Y	N	Y	N	N	Archived	ND	N/A	N/A				
791 Pioneer Creek Rd	Y																							

FOIA Request
Property Summary

Property Address	Property Activities				Secondary Source Indication	Observed Vermin/Insects				Samples Collected				Results				Additional Comments
	CSS	RI	Pre-Design	Clean Up		Attic	Walls	Basement	Building Materials	Garden	Flowerbed	Yard	Driveway	Soil	Dust	Soil	Dust	
23 Quercus Rd	S estimate	N	N	N	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	N	N	N	N	N/A
155 Sunny Side Dr	Y	N	Y	N	Y	Y	N	N	N	N	N	N	N	Y	Y	N	N	ND
W. Crystal Lake	N	N	N	N	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	N	N	N	N	N/A

* - Highest Likelihood of Vermin/Insect Activity

† - Test ID 10312

‡ - PLM-0012

• - PLM-001

• - PLM-001

ND - Not Detected

Y - Yes

N - No

TR - Test

NR - Not Reported